Case 1:22-cv-21233-KMM Document 34-1 Entered on FLSD Docket 05/10/2023 Page 1 of 5

FairLaw Firm 135 San Lorenzo Avenue Suite 770 Coral Gables, FL 33146

Email: info@fairlawattorney.com Website: https://fairlawattorney.com/



Services

INVOICE



Amount due 7,951.64

Date Ca	Staff Member ase 1:22-cv-212	Category 33-KMM Docume	Description ent 34-1 Entered on FLSD Docket 05/10/2023 Pag	Duration ge 2 of 5	Total
3/9/2022	Estefania Di Mare	Paralegal	Called client, had conf call identifying employer and documents he has to be sent for his case. Added details in Notes.	0.50	75.00
3/9/2022	Estefania Di Mare	Paralegal	Drafted letter and emailed to client regarding evidence preservation and the importance for them to submit all records pertaining to their case as soon as possible.	0.30	45.00
3/9/2022	Estefania Di Mare	Paralegal	Received analyzed text messages sent by client with employer.	0.30	45.00
3/10/2022	Toussaint M. Cummings, Esq.	Wage & Hour Plaintiff (State Court)	Draft minimum wage demand letter to employer.	0.50	175.00
3/10/2022	Toussaint M. Cummings, Esq.	Wage & Hour Plaintiff (State Court)	Draft standard 30 day demand letter to emloyer.	0.40	140.00
3/10/2022	Toussaint M. Cummings, Esq.	Wage & Hour Plaintiff (State Court)	Send demand letters to client for approval.	0.10	35.00
3/11/2022	Toussaint M. Cummings, Esq.	Wage & Hour Plaintiff (State Court)	Exchange emails with client.	0.20	70.00
3/11/2022	Toussaint M. Cummings, Esq.	Wage & Hour Plaintiff (State Court)	Revise demand letters based on feedback from client.	0.50	175.00
3/11/2022	Toussaint M. Cummings, Esq.	Wage & Hour Plaintiff (State Court)	Email demand letters to employer.	0.20	70.00
3/11/2022	Toussaint M. Cummings, Esq.	Wage & Hour Plaintiff (State Court)	Locate employer online for additional contact information.	0.10	35.00
4/20/2022	Brian H. Pollock, Esq.	FLSA - Plaintiff	Review file and documents provided by Mr. Sevares; then, draft Complaint for unpaid FLSA MW, B/K and U/E	1.00	450.00
4/20/2022	Brian H. Pollock, Esq.	FLSA - Plaintiff	Draft Summonses to each Defendant (x2)	0.30	135.00
4/20/2022	Estefania Di Mare	Paralegal	Drafted Civil Coversheet. Sent to attorney for review.	0.10	15.00
4/20/2022	Estefania Di Mare	Paralegal	Finalized Complaint and Summonses for filing.	0.10	15.00
4/20/2022	Estefania Di Mare	Paralegal	Drafted Notice of Appearance by TC. Sent to attorney for review.	0.20	30.00
4/20/2022	Estefania Di Mare	Paralegal	Drafted email to process server with instructions to serve summonses issued by the clerk and a copy of the e-filed complaint.	0.20	30.00
4/26/2022	Estefania Di Mare	Paralegal	Drafted letter and emailed to client regarding case being filed and details on what to expect next, along with a copy of the complaint.	0.30	45.00
4/27/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Analyze Order of Referral at ECF 5.	0.40	140.00
5/2/2022	Estefania Di Mare	Paralegal	Drafted email follow up to process server re service.	0.20	30.00
5/10/2022	Brian H. Pollock, Esq.	Document/File Management	Conduct routine file audit to determine what needs to be done and document file re: same	0.20	90.00
5/16/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Analyze documents in client file in preparation to draft statement of claim and calculate client's damages based on same.	0.70	245.00
5/16/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Draft Statement of Claim.	0.80	280.00
5/16/2022	Toussaint M.	FI SA - Plaintiff	Fmail to client	0.20	70 00

	Cummings, Esq.				
5/16/2022	ն գնսեցքու գ»,-212 Cummings, Esq.	33-KMM Docume FLSA - Plaintiff	ent 34-1 Entered on FLSD Docket 05/10/2023 Paç Phone call to client.	ge 3 of 5 0.20	70.00
5/16/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Draft Notice of Partial Compliance.	0.20	70.00
5/17/2022	Estefania Di Mare	Paralegal	Drafted letter re Statement of Claim filed in his case with details re it.	0.30	45.00
5/17/2022	Estefania Di Mare	Paralegal	Drafted email to process server requesting status on service.	0.20	30.00
5/17/2022	Estefania Di Mare	Paralegal	Had conf call with client re issues attempting to serve deft. He will gather the needed info for us and send it over shortly.	0.30	45.00
5/17/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Read and respond to emails regarding service of process and locating defendant.	0.20	70.00
5/17/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Search internet for picture of Defendant, Andre Luna.	0.10	35.00
5/18/2022	Estefania Di Mare	Paralegal	Spoke to client for further details on location to serve def. Drafted email to process server with further instructions.	0.30	45.00
6/2/2022	Estefania Di Mare	Paralegal	Drafted email to process server re service update.	0.20	30.00
6/3/2022	Toussaint M. Cummings, Esq.	Employment Litigation Plaintiff	Read and respond to email from process server authorizing surveillance.	0.20	70.00
6/14/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Email exchange with process server.	0.20	70.00
6/22/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Analyze Return of Service on Andres Luna.	0.10	35.00
6/28/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Email exchange with process server.	0.20	70.00
6/29/2022	Shakira Brizuela	Phone Call	client called to provide update on his case.	0.30	45.00
6/29/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Analyze Order to Show Cause at ECF 8.	0.10	35.00
6/30/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Phone call to Pedro from APC.	0.20	70.00
6/30/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Phone calls with client.	0.30	105.00
7/1/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Analyze FS 48.062 for rules on serving LLC.	0.20	70.00
7/1/2022	Toussaint M. Cummings, Esq.	Employment Litigation Plaintiff	Draft Response to Order to Show Cause.	0.80	280.00
7/15/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Analzye Order granting extension of time to server Defendants at ECF No 10.	0.10	35.00
8/15/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Draft amended complaint alleging service attempts.	0.50	175.00
8/15/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	draft alias summons.	0.20	70.00
8/15/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	draft motion for issuance of alias summons.	0.40	140.00
8/15/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	draft letter to secretary of state to serve APC LLC.	0.20	70.00
8/15/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	research procedure on obtaining substitute service on LLC.	0.80	280.00

8/22/2022 Ca	Toussaint M. a Ser<u>n</u>ningso√E24 .2	FLSA - Plaintiff 33-KMM Docume	Phone call to client ent 34-1 Entered on FLSD Docket 05/10/2023 Pag	0.10 ge 4 of 5	35.00
8/22/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Draft second motion for extension of time to perfect service.	0.40	140.00
8/23/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Analyze order granting motion for second extension of time at ECF 17.	0.20	70.00
9/2/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Draft third motion for extension of time to perfect service.	0.50	175.00
9/15/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Analyze Order at ECF 19 granting third motion for extension of time.	0.20	70.00
9/16/2022	Toussaint M. Cummings, Esq.	Draft/revise	drafted new letter to secretary of state with encl. R.O.S	0.20	70.00
9/21/2022	Toussaint M. Cummings, Esq.	Draft/revise	Drafted 1st Status report in compliance with ecf 19	0.50	175.00
10/11/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Drafted 2nd Status report in compliance with ecf 19	0.40	140.00
10/13/2022	Toussaint M. Cummings, Esq.	Draft/revise	Drafted Notice of Filing proof of service from secretary of state	0.20	70.00
10/17/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Analyze docket entry 23 re: service.	0.10	35.00
10/17/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Draft Motion for Clerk's Default and Proposed Clerk's Default Notice.	0.50	175.00
10/18/2022	Toussaint M. Cummings, Esq.	Draft/revise	Drafted letter enclosing motion for clerk default	0.10	35.00
10/31/2022	Shakira Brizuela	FLSA - Plaintiff	Drafted Motion for Default Final Judgment, Proposed Order for Final Judgment, Proposed Final Judgment, and Client's Declaration of Indebtedness.	2.40	360.00
11/9/2022	Shakira Brizuela	FLSA - Plaintiff	Revised Motion for Final Default Judgment and Proposed Orderer to add reference to records in support of wages owed.	0.20	30.00
11/11/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Read and revise Motion for Entry of Final Judgment, Proposed Final Judgment, Declaration of Indebtedness, and Proposed Order of Final Judgment.	0.80	280.00
11/11/2022	Shakira Brizuela	FLSA - Plaintiff	Telephone conference with client requesting signature on Declaration of Indebtedness.	0.10	15.00
11/21/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Analyze Order referring motion for default judgment to magistrate at ECF 29.	0.10	35.00
3/1/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze report and recommendation at ECF no. 31 granting Motion for Final Default.	0.40	150.00
4/4/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze paperless order at ECF 32 requiring explanation for no service on Luna.	0.10	37.50
5/3/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze Order adopting report and recommendation at ECF 33.	0.40	150.00
5/10/2023	Toussaint M. Cummings, Esq.	Draft/revise	Draft Motion for Fees and Costs.	1.30	487.50
5/10/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Calculate itemized billing to include in motion for fees and costs.	0.50	187.50

Services Subtotal: 7,422.50

	Vendor Case 1:22-cv-21 FairLaw Firm	Category 1233-KMM Documen Postage	Description t 34-1 Entered on FLSD Docket 05/10/2023 Page 5 of 5 Sent out both demand Itrs from saint	Total
3/14/2022	FairLaw Firm	Postage	sent out demand letter other address	0.53
4/20/2022	FairLaw Firm	Filing Fee - Federal Court	Complaint filing fee. EF.	402.00
5/25/2022	Miami PSPI, LLC	Service of Process	PSPI Invoice for Non-Service of American Pipeline #NAY-2022000676. EF.	46.60
5/25/2022	Miami PSPI, LLC	Service of Process	PSPI Invoice for Non-Service for A. Luna #NAY-2022000675. EF.	46.60
8/15/2022	FairLaw Firm	Service of Process	standard 8.75 for service secretary of state	8.75
8/15/2022	FairLaw Firm	Postage	sent out sevares secretary of state service	15.15
9/16/2022	FairLaw Firm	Postage	RE SENT OUT TO SECRETARY OF STATE	8.45

Expenses Subtotal: 529.14



